

3:23-mj-00049

STATE OF OREGON)
) ss.
County of Multnomah)

AFFIDAVIT OF RYAN R. DONOVAN

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Ryan R Donovan, being duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since August 2021. My current assignment as a member of the Violent Incident Crimes and Violent Crimes Against Children squad is to investigate federal violations including bank robberies, extortions, firearm violations, fugitive apprehensions, child abductions, child sexual abuse material, and human trafficking. My training and experience include a 20-week basic training course at the FBI Academy where I was taught to investigate a large variety of federal crimes using a variety of investigative techniques. Prior to joining the FBI, I was a police officer in Prince William County, Virginia, for over seven years.

2. I submit this affidavit in support of a criminal complaint and arrest warrant charging Craig Francis Haberman with two counts of unarmed Bank Robbery, in violation of 18 U.S.C. § 2113(a). As set forth below, I have probable cause to believe that Haberman committed those offenses.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all my knowledge about this matter. The facts in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation,

communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

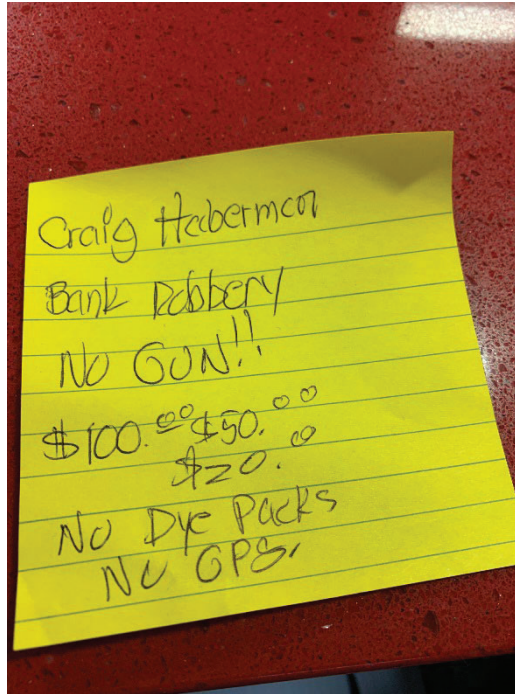
4. 18 U.S.C. § 2113(a) prohibits a person from using force and violence or intimidation to knowingly and unlawfully take or attempt to take currency or any other thing of value from a bank whose deposits are insured by the Federal Deposit Insurance Corporation.

Statement of Probable Cause

5. At about 4:50 pm on March 3, 2023, a Key Bank branch located at 350 South 1st Avenue, Hillsboro, Oregon 97123, was robbed. The robber, described as a white male in his 50s with grey hair and a grey beard, wearing a black leather jacket with a green sweatshirt, waited in line while making his way to the Victim Teller's counter to be helped. The robber approached the Victim Teller and stated that he had attempted to make an account online, but it was not working. He also stated that his Master Card was not working. The Victim Teller asked if he had an account, to which he responded yes. When the Victim Teller asked for his name, the robber asked for a piece of paper. The Victim Teller gave him a stack of yellow Post-It-style notes. The robber wrote a note, said something like "this is my name, and this is what I need, this is serious." The robber handed the note to the Victim Teller.

7. At the top of the note was the name "Craig Haberman," and the words "Bank Robbery", "No, Gun!!", "\$100.00, \$50.00, \$20.00," "No Dye Packs," "No GPS." The Victim Teller was confused by the note and asked if the robber wanted one \$100 bill, one \$50 bill, and one \$20 bill. He stated no, he wanted the \$100s, \$50s, and \$20s. The Victim Teller then provided him \$50 bills, \$20 bills, and \$10 bills totaling \$990.00. The bank's deposits were insured by the Federal Deposit Insurance Corporation at the time of the robbery.

Photograph of Bank Robbery Note



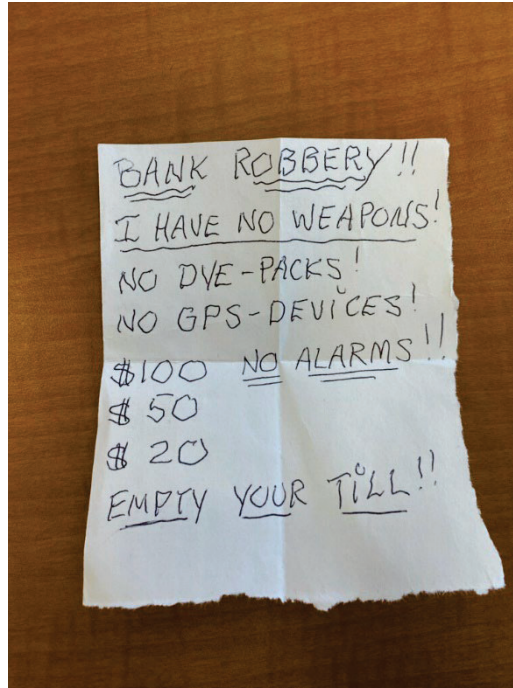
8. While Haberman was writing the note, the Victim Teller sent a message in the employee's Microsoft Teams Chat that said, "Robbery." A coworker saw the message and hit the silent alarm. The Victim Teller stated they were in fear and were scared that they all would get hurt.

9. A Hillsboro Police Detective was working at the time of the robbery and responded to the bank. He viewed a Washington County Sheriff's Office booking photograph of Haberman dated November 28, 2022, compared it to images of the robber from the bank's surveillance camera, and confirmed that Haberman was the robber. A still image from a bank surveillance camera and two booking photos of Haberman follow.



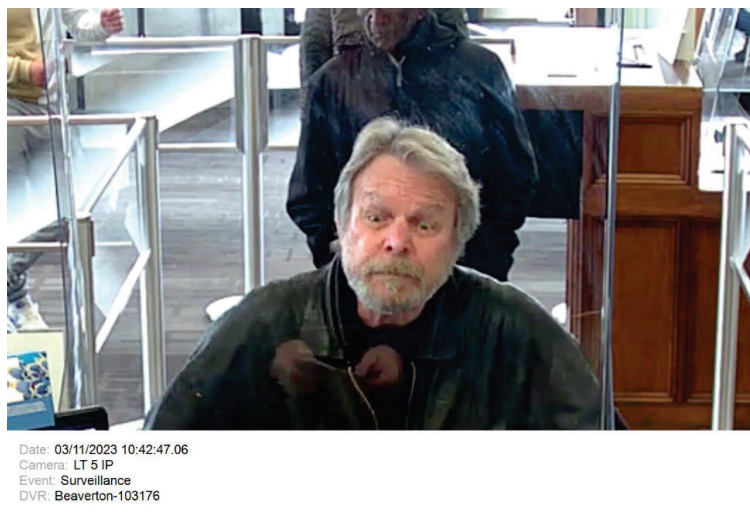
10. At about 10:36 am, on March 11, 2023, a Bank of America branch located at 12280 SW Canyon Rd, Beaverton, Oregon 97005 was robbed. The robber was described as a white male between 50 and 60 years old with grey hair and a grey beard, blue eyes, and a slim build. He was wearing what appeared to be a black Carhartt-style jacket. The robber approached the Victim Teller and stated he wanted to make a withdrawal before passing the Victim Teller a note which read “BANK ROBBERY!!”, “I HAVE NO WEAPONS!!”, “NO DYE-PACKS!!”, “NO GPS-DEVICES!!”, “\$100 NO ALARMS!!”, “\$50”, “\$20”, “EMPTY YOUR TILL!!”. The Victim Teller did not want to make a scene or alert security for fear of their safety and others. The Victim Teller followed the robber’s instructions and handed him \$1847.00 in bank funds. The robber then left the bank. The bank’s deposits were insured by the Federal Deposit Insurance Corporation at the time of the robbery. A photo of the demand note follows.

Photograph of Bank Robbery Note



11. Bank of America's global security office provided me with a surveillance photograph of the robber. The robber depicted in the photograph appears to be Haberman.

Bank of America Security Photograph



Conclusion

12. Based on the foregoing, I have probable cause to believe that Craig Francis Haberman committed two bank robberies in violation of 18 U.S.C. § 2113(a). I therefore request that the Court issue a criminal complaint and arrest warrant charging him with those offenses.

13. Prior to being submitted to the Court, this affidavit, the accompanying complaint, and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Gary Sussman. AUSA Sussman advised me that in his opinion, the affidavit is legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

(By telephone)

Ryan R. Donovan
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 2:41 pm
(a.m./p.m.) on March 16, 2023.

Youlee Yim You

Honorable Youlee Yim You
United States Magistrate Judge